

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,
Plaintiff,

Case No. **18-CR-00038-GAF**

v.

DELEON REED,
Defendant.

MOTION TO CONTINUE FINAL REVOCATION HEARING

Defendant Deleon Reed, through counsel, Laura O’Sullivan respectfully moves this Court to continue the final revocation for approximately 60 days, for the following reasons:

1. A final revocation hearing is currently scheduled for September 4, 2024, at 1:30 p.m.
2. This discovery has not been disseminated to undersigned counsel.
3. Mr. Reed and undersigned counsel require additional time to review the discovery, assess any potential legal issues, hire and consult with any necessary experts, and to have the time necessary for counsel’s effective preparation, considering the exercise of due diligence. See 18 U.S. Code § 3006A. This cannot reasonably be done by September 4, 2024.
4. Ashleigh Ragner, Assistant United States Attorney, was consulted and does not object to this continuance.
5. Mr. Reed joins in this request to continue and does not object to the requested period.

6. This continuance is not sought for the purpose of dilatory delay but is sought in truth and fact that Mr. Reed may be afforded due process of law.

WHEREFORE Mr. Reed respectfully moves this Court for an order continuing the final revocation hearing for approximately 60 days, and for whatever other relief this Court deems just and proper.

Respectfully Submitted,

SANDAGE LAW LLC

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CERTIFICATE OF SERVICE

On August 27, 2024, I served this document by depositing an electronic copy of it in the Court's electronic filing system, which shall distribute notice to all attorneys of record.

/s/ Laura O'Sullivan
Laura O'Sullivan